

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:16CR224
)	
Plaintiff,)	JUDGE PATRICIA A. GAUGHAN
)	
v.)	
)	
BOGDAN NICOLESCU,)	<u>MOTION FOR LEAVE TO FILE</u>
TIBERIU DANET,)	<u>PLEADINGS UNDER SEAL</u>
RADU MICLAUS)	
)	
Defendants.)	

Now comes the United States of America, by and through its counsel, Carole S. Rendon, United States Attorney, and Om M. Kakani, Assistant United States Attorney, and requests that this Court permit the government to file a pleading under seal for the reasons set forth. The government has prepared an *Unopposed Motion for a Protective Order and Proposed Order* regulating discovery in this matter. The government requests permission to file the *Unopposed Motion for a Protective Order and Proposed Order* under seal, in compliance with Loc. Crim. R. 16.1 and 49.4, to permit disclosure of discovery materials, including matters under seal, to the defendants and further explain the parameters of discovery production in this case.

Respectfully submitted,

CAROLE S. RENDON
United States Attorney

By: /s/ Om Kakani

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of December 2016 a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Om Kakani

Om Kakani

Assistant U.S. Attorney